

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

January 14, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: Ex Parte/Reply to Oppositions
GEN Docket No. 90-314 (Personal Communications Services)

Dear Mr. Caton:

On Friday, January 14, 1994, the Cellular Telecommunications Industry Association ("CTIA") sent the attached letters transmitting the Reply to Opposition of the CTIA to Petitions for Reconsideration, to the FCC staff listed below.

RECEIVED

JAN 14 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Sarah Siedman
David Siddall
Richard Smith
David Solomon
Thomas Spavins
Merrill Spiegel
Dr. Tom Stanley
Gerald Vaughan
Greg Vogt
John Williams
John Winston



CTIA

Cellular
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Building The
Wireless Future

Mr. Caton
January 14, 1994
Page 2

If there are any questions in this regard, please contact the undersigned.

Sincerely,



Robert F. Roche

Enclosure

January 14, 1994

CTIA



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**Building The
Wireless Future ..**

Thomas E. Wheeler
President/CEO

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Chairman:

Yesterday, Wednesday, January 13, 1994, the Cellular Telecommunications Industry Association ("CTIA") filed the attached Reply to Oppositions to the Petitions for Reconsideration in GEN Docket No. 90-314.

CTIA reaffirms that its proposal to allocate four 20 MHz blocks and four 10 MHz blocks, is consistent with and will efficiently realize the Commission's goals of universality; speed of deployment; diversity of services; and competitive delivery.

Such a modular approach will facilitate spectrum efficiency, while providing the building blocks participants may conceive necessary to realize their business plans. As such, this approach will husband scarce resources, *and* permit a broad range of PCS services to be developed and delivered.

Likewise, use of a BTA-only service area scheme will better achieve efficiencies than a larger initial allocation, by permitting participants to bid for the geographic markets they conceive necessary to realize their vision of PCS.

Relaxing the overly-restrictive eligibility and attribution standards for the participation of other wireless companies and owners will enhance the consumer interest, as reliance on existing antitrust principles will remain consistent with the Commission's underlying rationale for imposing such restrictions in the first place: concern over undue market power. CTIA's proposed overlap threshold of 40 % and attribution standard of 30-35 % will permit greater involvement on the part of such wireless service providers and investors *and* guarantee fair competition.

The arguments presented by opponents of CTIA's proposals provide no evidence to refute our analysis. The Commission should therefore reject those arguments, and adopt CTIA's proposals.

Very truly yours,

Thomas E. Wheeler

January 14, 1994

Dr. Thomas Stanley
Chief Engineer
Federal Communications Commission
2025 M Street, N.W. Room 7002
Washington, D.C. 20554

CTIA

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1133 21st Street, NW
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Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

**Building The
Wireless Future**

Thomas E. Wheeler
President/CEO

Dear Tom:

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Very truly yours,


Thomas E. Wheeler

January 14, 1994

Dr. Robert Pepper
Chief, Office of Plans & Policy
Federal Communications Commission
1919 M Street, N.W. Room 822
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Bob:

Yesterday, Wednesday, January 13, 1994, the Cellular Telecommunications Industry Association ("CTIA") filed the attached Reply to Oppositions to the Petitions for Reconsideration in GEN Docket No. 90-314.

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Thomas E. Wheeler



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Thomas E. Wheeler
President/CEO

January 14, 1994

Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W. Room 826
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Andy:

Yesterday, Wednesday, January 13, 1994, the Cellular Telecommunications Industry Association ("CTIA") filed the attached Reply to Oppositions to the Petitions for Reconsideration in GEN Docket No. 90-314.

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Thomas E. Wheeler

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Thomas E. Wheeler
President/CEO

January 14, 1994

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W. Room 802
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Jim:

Yesterday, Wednesday, January 13, 1994, the Cellular Telecommunications Industry Association ("CTIA") filed the attached Reply to Oppositions to the Petitions for Reconsideration in GEN Docket No. 90-314.

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Thomas E. Wheeler


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Thomas E. Wheeler
President/CEO

January 14, 1994

Commissioner Ervin S. Duggan
Federal Communications Commission
1919 M Street, N.W. Room 832
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Ervin:

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Thomas E. Wheeler
President/CEO

January 14, 1994

Ms. Karen Brinkmann
Special Assistant to the Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554


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Personal Communications Services

**Building The
Wireless Future**

Dear Ms. Brinkmann: -

Thomas E. Wheeler
President/CEO

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